

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

WAGERLOGIC LIMITED,

Plaintiff,

vs.

PARAMOUNT DIGITAL ENTERTAINMENT, a
division of PARAMOUNT PICTURES
CORPORATION,

Defendant and
Counter-Plaintiff,

vs.

CRYPTOLOGIC LIMITED and GAMING
PORTALS LIMITED,

Third-Party Defendants.

Oral
Argument Requested

Civil Action No. 11 CV 4310(BSJ)(DCF)

**NOTICE OF MOTION OF PLAINTIFF
WAGERLOGIC LIMITED FOR PARTIAL
SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that plaintiff WagerLogic Limited, upon its Complaint, the annexed Declaration of Jeffrey E. Glen, dated November 22, 2011, and the exhibits thereto, the Rule 56.1 Statement submitted herewith, and the points and authorities set forth in the Memorandum of Law submitted herewith, will move this Court before the Honorable Barbara S. Jones at the United States Courthouse, 500 Pearl Street, New York, New York, on a date and time to be determined by the Court for an Order pursuant to Fed.R.Civ.P. 56

a. Declaring that pursuant to the Licensing Agreement entered into between the parties licensing the use by plaintiff of certain intellectual property owned by defendant, plaintiff timely cured its alleged failure to pay the final installment of the Existing Pictures License Fee of \$250,000 and the Future Pictures Guarantee of \$250,000 by paying \$500,000 to defendants on February 24, 2011,

- b. Declaring that defendant has no power under the Licensing Agreement to terminate the Agreement based on an alleged failure of plaintiff to meet the Existing Pictures Marketing Date,
- c. Declaring that defendant's purported termination of the Licensing Agreement, as contained in a purported "Notice of Termination" dated February 23, 2011, was null, void, and of no effect,
- d. Dismissing defendant's counterclaim against plaintiff as set forth in paragraph 100 of defendant's Counterclaims and in paragraph b of defendant's prayer for relief set forth at page 28 of defendants Counterclaims,
- e. Granting such other and further relief as the Court deems just and proper.

Dated: New York, New York
November 22, 2011

ANDERSON KILL & OLICK, P.C.

By: 

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